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Attorneys for Pan and Law Creditors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re:

Blue Moon Property Group, LLC

Debtor.

Case No. 22-31873-thp11

PAN AND LAW CREDITORS
OBJECTION TO DEBTOR'S NOTICE
OF SETTLEMENT, NOTICE OF
MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT

Creditors (a) Gretchen Pan, an individual; Gretchen Pan, as successor in interest to the Elizabeth Steiner Trust; and Xianghua 'Ed' Pan (collectively, the "Pans") and (b) Darrel L. Deem, an individual; Darrel L. Deem, on behalf of his Roth IRA #14459; David G. Law, an individual; David G. Law, on behalf of his Roth IRA #11396; Janine W. Law, an individual; Janine W. Law, on behalf of her Roth IRA #12075; DJ Property Solutions, LLC, a Utah limited liability company; Deem Realty Funding, Inc., a Utah corporation; and Deem Investment Company, a Utah Corporation (collectively, the "Law Creditors")) object to Debtor's Notice of

Settlement, Notice of Motion and Motion for Approval of Settlement (the “Settlement Motion”) and in support of their objection, states as follows:

The Pan and Law Creditors entered into a settlement agreement with the Debtor that expired on its own terms as of September 1, 2022. Therefore, no binding settlement agreement currently exists between the parties.

Unless a new settlement agreement is entered into, and approved by the court, the Debtor’s Motion should be denied as the sole basis to approve the Settlement with the Law and Pan Creditors is Section 363(f)(2) (consent). Because there is no consent from the Pan and Law Creditors, no authority to approve the settlement exists.

Dated March 31, 2023.

MOTSCHENBACHER & BLATTNER LLP

/s/ TROY G. SEXTON

Troy G. Sexton, OSB No. 115184

Attorneys for the Pan and Law Creditors

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the foregoing PAN AND LAW CREDITORS OBJECTION TO DEBTOR'S NOTICE OF SETTLEMENT, NOTICE OF MOTION AND MOTION FOR APPROVAL OF SETTLEMENT was provided to all participants of the Court's CM/ECF System.

DATED: March 31, 2023.

MOTSCHENBACHER & BLATTNER LLP

/s/ TROY G. SEXTON

Troy G. Sexton, OSB No. 115184

Attorneys for the Pan and Law Creditors